

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Scott A. Lemieux,

Civ. No. 0:16-cv-01794 (JRT-HB)

Plaintiff,

vs.

**DEFENDANT'S MOTION FOR  
PROTECTIVE ORDER**

Soo Line Railroad Company d/b/a  
Canadian Pacific Railway,<sup>1</sup>

Defendant.

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TO: Plaintiff above-named and his attorneys, Thomas W. Fuller, Hunegs, LeNeave & Kvas, P.A., 1000 Twelves Oaks Center Drive, Suite 101, Wayzata, MN 55391

Defendant Soo Line Railroad Company d/b/a Canadian Pacific ("CP") hereby moves the Court for a protective order precluding the deposition of Robert Johnson pursuant to Fed. R. Civ. P. 26(c). Defendant's Motion will be based on motion papers, including Defendant's memorandum of law in support of this motion with supporting affidavits/declarations and exhibits filed herewith, and any other supporting papers which will be filed and served in accordance with the parties' agreement and Local Rule 7.1.

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<sup>1</sup> The proper entity name for Defendant is Soo Line Railroad Company d/b/a Canadian Pacific.

Dated: December 15, 2017

/s/ Tracey Holmes Donesky

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